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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

PO Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300

May 19, 2014

Mr. Keith Taylor
Statewide Mortgage Services
425 Pike Street
Seattle, WA 98101-3902

Re: No Further Action at a Property associated with the Asarco Tacoma Smelter Site:

- Name: Meridian Campus – Campus Highlands North Div 1 (formerly part of the SF1 Tract and Campus Highlands)
- Property Address: 4101, 4104, 4107, 4110, 4113, 4116, and 4119 Michael Court NE; 4103, 4106, 4109, 4114, 4115, 4120, 4121, 4126, 4127, 4132, 4133, 4138, and 4139 Abigail Court NE; 4204, 4205, 4208, 4213, 4214, 4221, 4222, 4226, 4227, 4232, 4233, 4238, 4239, 4244, 4245, 4250 Abigail Drive NE; and 4209, 4232, 4244, and 4251 Campus Park Drive NE; Lacey, WA 98516
- Facility/Site No.: 20920
- Cleanup Site ID: 12106
- VCP Project No.: SW1293

Dear Mr. Taylor:

The Washington State Department of Ecology (Ecology) received your request for an opinion on your independent cleanup of a Property associated with the Asarco Tacoma Smelter Site (Site). This letter provides our opinion. We are providing this opinion under the authority of the Model Toxics Control Act (MTCA), Chapter 70.105D RCW.

Issues Presented and Opinion

1. Is further remedial action necessary at the Property to clean up contamination associated with the Site?

NO. Ecology has determined that no further remedial action is necessary at the Property to clean up contamination associated with the Site.

2. Is further remedial action still necessary elsewhere at the Site?

YES. Ecology has determined that further remedial action is still necessary elsewhere at the Site.



This opinion is based on an analysis of whether the remedial action meets the substantive requirements of MTCA, Chapter 70.105D RCW, and its implementing regulations, Chapter 173-340 WAC (collectively "substantive requirements of MTCA"). The analysis is provided below.

Description of the Property and the Site

This opinion applies only to the Property and the Site described below. This opinion does not apply to any other sites that may affect the Property. Any such sites, if known, are identified separately below.

1. Description of the Property.

The Property includes the following tax parcel in Thurston County, which was affected by the Site and will be addressed by your cleanup:

- #38280100001 to 38280100005
- #38280100100 to 38280103600

Enclosure A includes a legal description of the Property and details of the Property as currently known to Ecology. **Enclosure A** includes a list of all the addresses and parcel numbers associated with the Property.

2. Description of the Site.

The Site is defined by the nature and extent of contamination associated with the following releases:

- Arsenic into the Soil.
- Lead into the Soil.

Those releases have affected more than one parcel of real property, including the parcel identified above.

Enclosure B includes a detailed description and diagram of the Site, as currently known to Ecology.

3. Identification of Other Sites that may affect the Property.

Please note a parcel of real property can be affected by multiple sites. At this time, we have no information that the Property is affected by other sites.

This opinion is based on the information contained in the following documents:

1. Landau Associates, No Further Action Request Report - Campus Highlands North, Division 1 - Meridian Campus Development, dated February 27, 2013.
2. Jessica Stone (Landau Associates), e-mail correspondence with Elizabeth Weldin (Ecology) regarding stockpile sampling, dated August 22, 2013.
3. Jessica Stone (Landau Associates), e-mail correspondence with Elizabeth Weldin (Ecology) regarding stockpile and confirmation sampling, dated August 12, 2013.
4. City of Lacey, Zoning Map, dated August 12, 2013.
5. Jessica Stone (Landau Associates), e-mail correspondence with Elizabeth Weldin (Ecology) regarding stockpiling and no soil export from Property, dated August 9, 2013.
6. Doreena Baird (Thurston County), e-mail correspondence with Elizabeth Weldin (Ecology) regarding parcel number assignments, dated August 6, 2013.
7. Thurston County, Campus Highlands North Division 1 Plat Map – Recording #4332914, dated April 29, 2013.
8. City of Lacey, Minutes of a Regular Meeting of the Lacey City Council Held Thursday, April 25, 2013, in Lacey Council Chambers, dated April 25, 2013.
9. Landau Associates, No Further Action Request Report, Campus Highlands North, Division 1, Meridian Campus Development, dated February 27, 2013.
10. Washington Forestry Consultants, Inc, Tree Protection Plan for Campus Highlands North, dated November 20, 2006.
11. Thomas D. Deming, Wetland Report for Campus Highlands North Wetland #6, dated October 3, 2006.
12. Joyce Mercuri (Ecology), letter to Mr. Eric Weber (Landau Associates), RE: Opinion on Proposed Remedial Action for Meridian Campus Development, dated January 24, 2006.
13. Huitt-Zollars, Inc., Preliminary Drainage Design Report for Campus Highlands Division 2, dated January 19, 2006.
14. Meridian Campus Development Partnership, LLC, Environmental Checklist, dated October 2005

15. Landau Associates, Cleanup Action Plan and Site Characterization Meridian Campus Development, dated June 16, 2005.

16. Landau Associates, Draft Sampling and Analysis Plan Meridian Campus Development, dated February 4, 2005.

Those documents are kept in the Central Files of the Southwest Regional Office of Ecology (SWRO) for review by appointment only. You can make an appointment by calling the SWRO resource contact at (360) 407-6365.

This opinion is void if any of the information contained in those documents is materially false or misleading.

Analysis of the Cleanup

1. Cleanup of the Property located within the Site.

Ecology has concluded that **no further remedial action** is necessary at the Property to clean up contamination associated with the Site. That conclusion is based on the following analysis:

a. Characterization of the Site.

The Site is described in **Enclosure B**.

For almost 100 years the Asarco Company operated a copper smelter in Tacoma, Washington. Air pollution from the smelter settled on the surface soil over a vast region -- more than 1,000 square miles of the Puget Sound basin. Arsenic, lead, and other heavy metals are still in the soil as a result of this pollution. Ecology has found elevated levels of arsenic and lead as far south as Lacey and as far north as Seattle (West Seattle), and as far west as the Kitsap Peninsula and as far east as Kent and Bellevue.

The Campus Highlands North, Division 1 is part of the 1,153-acre Meridian Campus Development in Lacey, Washington. See Enclosure A and Figures 1, 2, and 3 for more information about the Property, which is approximately 14.4 acres.

In March 2005, two soil samples were collected from a 6-inch depth from Campus Highlands North, Division 1 during the characterization of the entire Meridian Campus Development. Arsenic concentrations were 19.3 milligrams per kilograms (mg/kg) and 22.1 mg/kg. Lead soil concentrations were 11 mg/kg and 31 mg/kg. No duff sampling was done as part of the characterization.

b. Establishment of cleanup standards for the Site.

Ecology has determined the cleanup levels and points of compliance established for the Site meet the substantive requirements of MTCA.

As part of the Interim Action Plan for the Asarco Tacoma Smelter Site (June 2012) (IAP), Ecology completed a terrestrial ecological evaluation for properties with only Tacoma Smelter Plume contamination. Ecology determined the MTCA Method A cleanup levels for both arsenic and lead were protective of both human health and the environment. The MTCA Method A cleanup levels for soil are as follows:

- Arsenic is 20 mg/kg.
- Lead is 250 mg/kg.

The IAP determined that the cleanup level protective of human health and the environment for properties within the Asarco Tacoma Smelter Site are the following:

- Average arsenic concentration detected in the soil is less than 20 mg/kg.
- Average lead concentration detected in the soil is less than 250 mg/kg.

OR

- No single soil sample has arsenic concentration above 40 mg/kg.
- No single soil sample has lead concentration above 500 mg/kg.

c. Selection of cleanup for the Property.

In June 2005, Landau Associates developed a cleanup action plan for the entire Meridian Campus Development. The cleanup action plan described soil mixing done through development grading activities as a way to remediate the Tacoma Smelter Plume contamination. Ecology issued an opinion letter for the cleanup action plan in 2006. This letter described the number of compliance samples that should be collected to obtain a No Further Action letter.

Ecology has determined the cleanup you selected for the Property meets the substantive requirements of MTCA and the IAP. The cleanup meets the minimum cleanup requirements and does not exacerbate conditions or preclude reasonable cleanup alternatives elsewhere at the Site.

d. Cleanup of the Property.

Ecology has determined the cleanup you performed meets the applicable Site cleanup standards within the Property.

The contractor scraped, mixed, and stockpiled the upper soil layer on the Property, except for a small tract of dedicated open space. The stockpile contained 6,500 cubic yards of soil. No soil was brought onto or taken from the Property.

Initial confirmational sampling: On July 23, 2012, Landau Associates took samples from the top 6 inches of soil after grading, in accordance with the 2005 Sampling and Analysis Plan for Meridian Campus. Three-point composite samples were taken from 11 locations within Campus Peak. The three samples in each composite came from 10 square foot areas. The following results showed no further cleanup actions were needed:

- Arsenic levels ranging from 0.51 to 15 mg/kg.
- Lead levels ranging from 2.1 to 29 mg/kg.

Stockpile sampling: Prior to reuse on the property, Landau Associates collected soil from 10 locations evenly spaced throughout the stockpile. From one location in each grid, soil was collected from 12 inches in depth, and mixed to get a composite sample. Landau had mistakenly deviated from the stockpile sampling protocol in the cleanup action plan. However, Ecology decided to allow this deviation based on the low arsenic and lead levels found in characterization and confirmational samples. The stockpile results were as follows:

- Arsenic levels ranging from 10 to 20 mg/kg.
- Lead levels ranging from 20 to 31 mg/kg.

Final confirmational sampling: On October 25, 2012, Landau Associates took samples from the top 6 inches of soil, in accordance to Ecology's 2006 opinion letter. Three-point composite samples were taken from 11 locations within the Property. The three samples in each composite came from 10 square foot areas. The following results showed no further cleanup actions were needed:

- Arsenic concentrations ranging from 2.8 to 13 mg/kg.
- Lead concentrations ranging from 2 to 56 mg/kg.

Wetland sampling: The south central part of the Property has a wetland and buffer area that will not be developed. The one sample taken from the buffer area, for informational purposes, had 12 mg/kg arsenic and 9.7 mg/kg lead. On November 4, 2013, Landau Associates provided Ecology with an addendum describing additional wetland sampling results (Table 3). Four samples were taken from a 6-inch depth. The additional results were as follows:

- Arsenic concentrations ranging from 8 to 21 mg/kg.
- Lead concentrations ranging from 9 to 17 mg/kg.

The sampling addendum included one forest duff sample composited from six subsamples taken from the wetland area. The arsenic level was 12 mg/kg and lead was 21 mg/kg.

2. Cleanup of the Site as a whole.

Ecology has concluded that **further remedial action** under MTCA is still necessary elsewhere at the Site. In other words, while your cleanup constitutes the final action for the Property, it constitutes only an **“interim action”** for the Site as a whole.

Listing of the Site

Based on this opinion, Ecology will update the status of remedial action at the Site on our database of hazardous waste sites. However, because further remedial action is still necessary elsewhere at the Asarco Tacoma Smelter Site, we will not remove the Site from our lists of hazardous waste sites. Furthermore, the Property will remain listed as part of the Site because the cleanup of the Property does not change the boundaries of the Site.

Limitations of the Opinion

1. Opinion does not settle liability with the state.

Liable persons are strictly liable, jointly and severally, for all remedial action costs and for all natural resource damages resulting from the release or releases of hazardous substances at the Property. This opinion **does not**:

- Change the boundaries of the Site.
- Resolve or alter a person’s liability to the state.
- Protect liable persons from contribution claims by third parties.

To settle liability with the state and obtain protection from contribution claims, a person must enter into a consent decree with Ecology under RCW 70.105D.040(4).

2. Opinion does not constitute a determination of substantial equivalence.

To recover remedial action costs from other liable persons under MTCA, one must demonstrate that the action is the substantial equivalent of an Ecology-conducted or Ecology-supervised action. This opinion does not determine whether the action you proposed will be substantially equivalent. Courts make that determination. *See* RCW 70.105D.080 and WAC 173-340-545.

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3. State is immune from liability.

The state, Ecology, and its officers and employees are immune from all liability, and no cause of action of any nature may arise from any act or omission in providing this opinion. See RCW 70.105D.030(1)(i).

Termination of Agreement

Thank you for cleaning up your Property under the Voluntary Cleanup Program (VCP). This opinion terminates the VCP Agreement governing this project (#SW1293).

For more information about the VCP and the cleanup process, please visit our web site: www.ecy.wa.gov/programs/tcp/vcp/vcpmain.htm. If you have any questions about this opinion or the termination of the Agreement, please contact me by phone at 360-407-6257 or by e-mail at Marian.Abbett@ecy.wa.gov.

Sincerely,



Marian L. Abbett
SWRO Toxics Cleanup Program

MLA/ksc:NFA Campus Highland N Div 1

Enclosures: Enclosure A: Legal description, addresses and parcel numbers, and general description of the Property
Enclosure B: Asarco Tacoma Smelter site description
Figure 1: Vicinity map
Figure 2: Meridian Campus Master Plan
Figure 3: Lot Map
Table 1: Soil Stockpile Sample Results
Table 2: Initial Soil Confirmation Sample Results
Table 3: Final Soil Confirmation Sample Results, including additional wetland sampling results

By certified mail: (7012 2210 0002 6581 3554)

cc: Jessica Stone, Landau Associates
Rick Walk; City of Lacey Community Development
Samra Seymour; City of Lacey Community Development
Gerald Tousley; Environmental Health Thurston County Public Health and Social Services;
Scott Rose – Ecology
Dolores Mitchell – Ecology w/o enclosures

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Enclosure A

Legal Description of the Property

Campus Highlands North Division 1 according to the plat thereof recorded April 29, 2013 under Auditor's File No. 4332914, records of Thurston County, Washington

PARCEL I:

PARCEL A OF LARGE LOT SEGREGATION RECORDED NOVEMBER 4, 2010 UNDER RECORDING NO. 4179893, IN THURSTON COUNTY, WASHINGTON.
EXCEPT THEREFROM THAT PORTION LYING WITHIN BOUNDARY LINE ADJUSTMENT NO. BLA10013LA, RECORDED DECEMBER 30, 2010, UNDER RECORDING NO. 4189919 OF OFFICIAL RECORDS, IN THURSTON COUNTY, WASHINGTON.

PARCEL II:

TRACT F OF CAMPUS HIGHLANDS DIVISION 5, ACCORDING TO PLAT THEREOF RECORDED AUGUST 27, 2010 UNDER RECORDING NO. 4167383 OF OFFICIAL RECORDS, IN THURSTON COUNTY, WASHINGTON.

APN: 38280000009

APN: 11936110000

Campus Highlands North Division 1 Addresses and Parcel Numbers

Tract/Lot	Parcel #	Address
Tract A	38280100001	4251 Campus Park Drive NE; Lacey, WA 98516
Tract B	38280100002	4244 Campus Park Drive NE; Lacey, WA 98516
Tract C	38280100003	4232 Campus Park Drive NE; Lacey, WA 98516
Tract D	38280100004	4209 Campus Park Drive NE; Lacey, WA 98516
Tract E	38280100005	4254 Abigail Drive NE; Lacey, WA 98516
Lot 1	38280100100	4115 Michael Court; Lacey, WA 98516
Lot 2	38280100200	4110 Michael Court; Lacey, WA 98516
Lot 3	38280100300	4104 Michael Court; Lacey, WA 98516
Lot 4	38280100400	4101 Michael Court; Lacey, WA 98516
Lot 5	38280100500	4107 Michael Court; Lacey, WA 98516
Lot 6	38280100600	4113 Michael Court; Lacey, WA 98516
Lot 7	38280100700	4119 Michael Court; Lacey, WA 98516
Lot 8	38280100800	4138 Abigail Court; Lacey, WA 98516
Lot 9	38280100900	4132 Abigail Court; Lacey, WA 98516
Lot 10	38280101000	4126 Abigail Court; Lacey, WA 98516
Lot 11	38280101100	4120 Abigail Court; Lacey, WA 98516
Lot 12	38280101200	4114 Abigail Court; Lacey, WA 98516
Lot 13	38280101300	4106 Abigail Court; Lacey, WA 98516
Lot 14	38280101400	4103 Abigail Court; Lacey, WA 98516
Lot 15	38280101500	4109 Abigail Court; Lacey, WA 98516
Lot 16	38280101600	4115 Abigail Court; Lacey, WA 98516
Lot 17	38280101700	4121 Abigail Court; Lacey, WA 98516
Lot 18	38280101800	4127 Abigail Court; Lacey, WA 98516
Lot 19	38280101900	4133 Abigail Court; Lacey, WA 98516
Lot 20	38280102000	4139 Abigail Court; Lacey, WA 98516
Lot 21	38280102100	4205 Abigail Drive NE; Lacey, WA 98516
Lot 22	38280102200	4213 Abigail Drive NE; Lacey, WA 98516
Lot 23	38280102300	4221 Abigail Drive NE; Lacey, WA 98516
Lot 24	38280102400	4227 Abigail Drive NE; Lacey, WA 98516
Lot 25	38280102500	4233 Abigail Drive NE; Lacey, WA 98516

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Tract/Lot	Parcel #	Address
Lot 26	38280102600	4239 Abigail Drive NE; Lacey, WA 98516
Lot 27	38280102700	4245 Abigail Drive NE; Lacey, WA 98516
Lot 28	38280102800	4250 Abigail Drive NE; Lacey, WA 98516
Lot 29	38280102900	4244 Abigail Drive NE; Lacey, WA 98516
Lot 30	38280103000	4238 Abigail Drive NE; Lacey, WA 98516
Lot 31	38280103100	4232 Abigail Drive NE; Lacey, WA 98516
Lot 32	38280103200	4226 Abigail Drive NE; Lacey, WA 98516
Lot 33	38280103300	4222 Abigail Drive NE; Lacey, WA 98516
Lot 34	38280103400	4214 Abigail Drive NE; Lacey, WA 98516
Lot 35	38280103500	4208 Abigail Drive NE; Lacey, WA 98516
Lot 36	38280103600	4204 Abigail Drive NE; Lacey, WA 98516

Property Description

Campus Highlands North, Division 1 (Property) is part of the Meridian Campus Development in Lacey Washington. The Property (14.4 acres) is located west of the intersection Campus Highlands Drive and Cameron Drive NE. Campus Highlands Drive and Campus Park Drive NE run through the middle of the subdivision. The Property is zoned "Low Density Residential 0-4". The development is bordered by The Woodlands Golf Course, City of Lacey Meridian Campus North Neighborhood Park, and a residential development.

On April 25, 2013, the Lacey City Council subdivided the Property and assigned addresses to 36 single-family residential lots. Additionally, the City created and assigned addresses to four tracts slated open space and sensitive area protection. The addresses and parcel numbers for the newly created lots and tracts can be found in Enclosure B.

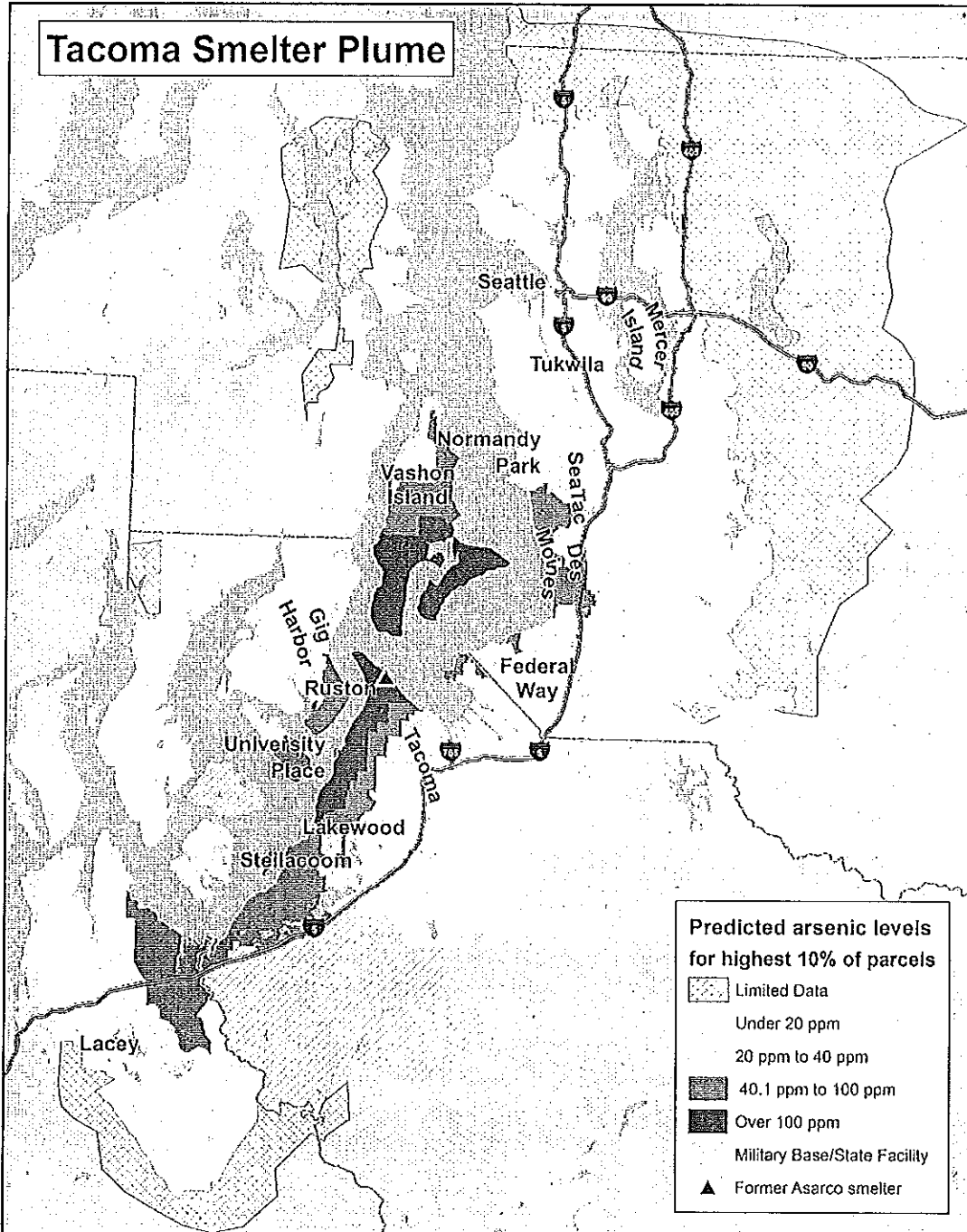
Originally, the Property was undeveloped forestland with mildly undulating topography directly west of the Nisqually Delta. Prior to clearing and grading, the Property consisted of second and third growth forest with dense understory. The elevation of the site is approximately 260 to 280 feet mean sea level (MSL). The protected wetland is located in a depression with side slopes up to 12%. The wetland is dominated by Douglas spirea (*Spiraea douglasii*), and Nootka rose (*Rosa nutkana*). The protected wetland buffer is dominated by Douglas fir (*Pseudotsuga menziesii*)

At the issuance of this determination, the contractor had installed sidewalks, a paved public street, and landscaping. Some house had been constructed. Through grading, the Property is now flat except for the Tract D – Wetland and associated buffer (84,356 square feet).

The United States Department of Agriculture maps the upper soil layers at Alderwood gravelly sandy loam. The upland is generally underlain by recessional outwash deposits and glacial till. A weakly cemented hardpan is at a depth of 20 to 40 inches. The uppermost aquifer beneath the Property is the Qva aquifer – which is at the estimated elevation between 125 to 150 feet MSL.

Enclosure B

Asarco Tacoma Smelter Site



An interactive color map can be found at <https://fortress.wa.gov/ecy/smeltersearch/>

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For almost 100 years the Asarco Company operated a copper smelter in Tacoma, Washington. Air pollution from the smelter settled on the surface soil over a vast region -- more than 1,000 square miles of the Puget Sound basin. Arsenic, lead, and other heavy metals are still in the soil as a result of this pollution. Ecology has found elevated levels of arsenic and lead as far south as Lacey and as far north as Seattle (West Seattle), and as far west as the Kitsap Peninsula and as far east as Kent and Bellevue.

Figure 1. Vicinity Map

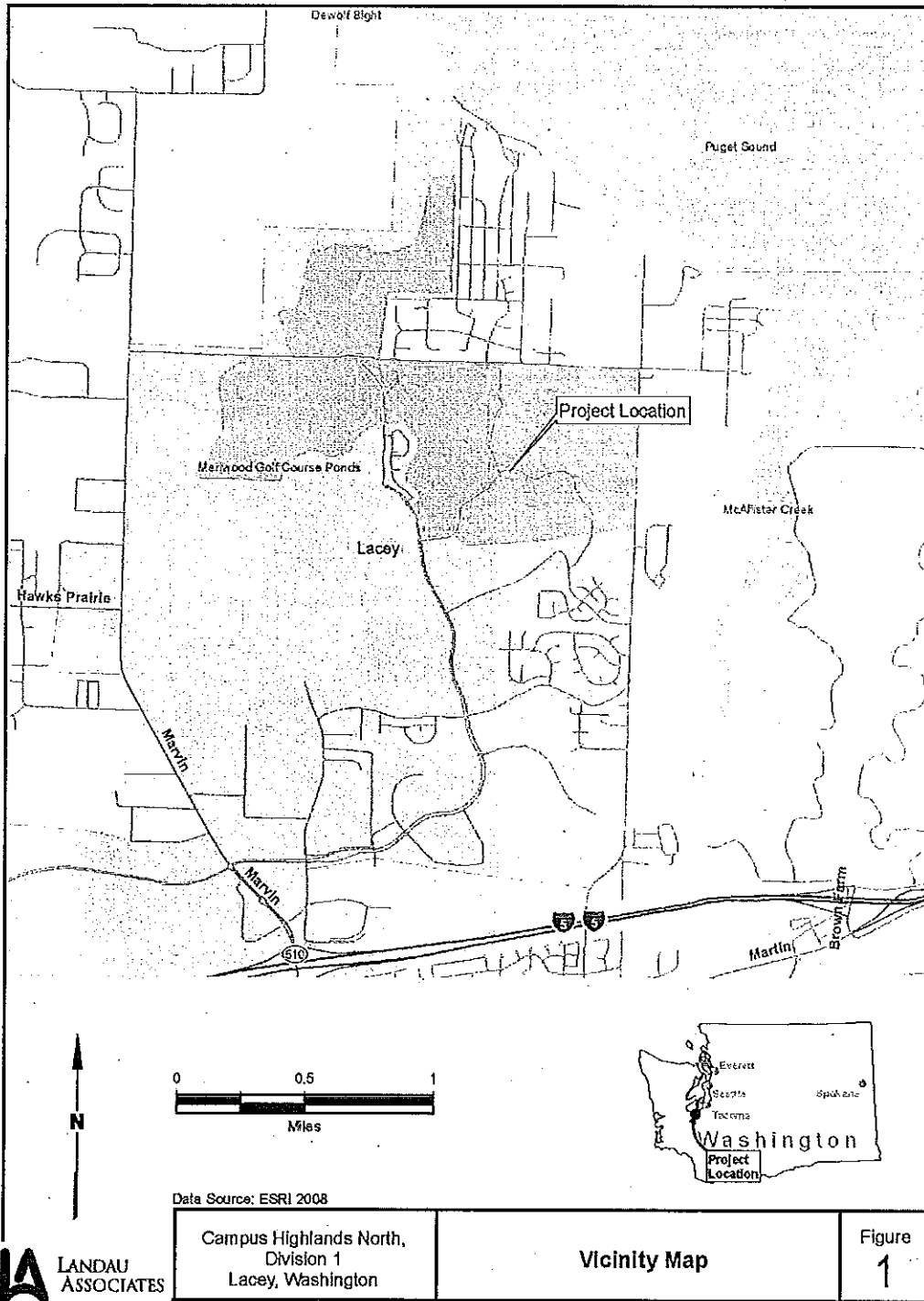
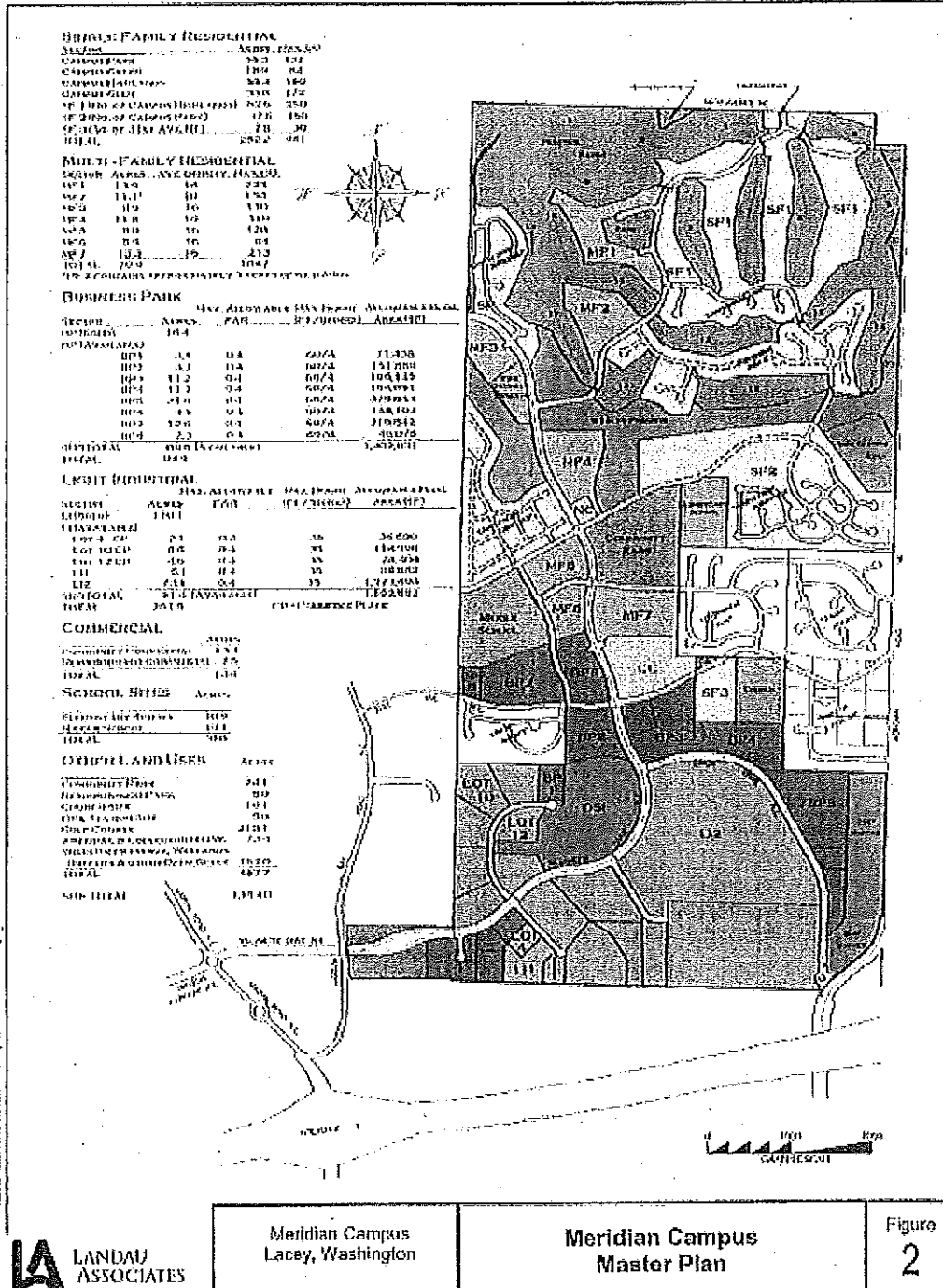


Figure 2. Meridian Campus Master Plan



Meridian Campus
 Lacey, Washington

Meridian Campus
 Master Plan

Figure
 2

Figure 3. Lot Map

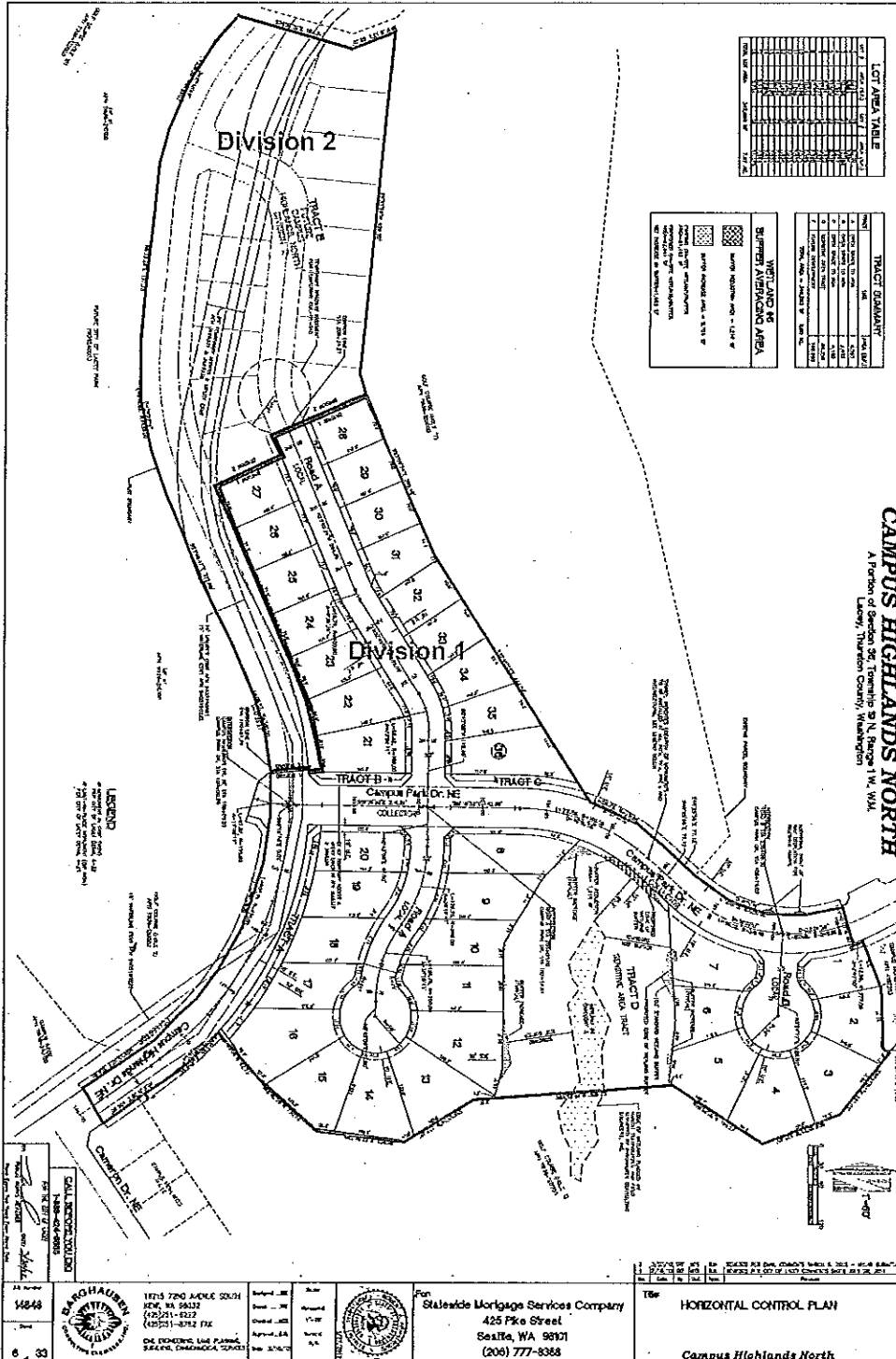


TABLE 1
SOIL STOCKPILE SAMPLE RESULTS
CAMPUS HIGHLANDS NORTH, DIVISION 1
LACEY, WASHINGTON

Sample ID	Sample Date	Arsenic (mg/kg)	Lead (mg/kg)
CHdv1-01ss	7/23/12	10	23
CHdv1-02ss	7/23/12	11	25
CHdv1-03ss	7/23/12	10	21
CHdv1-04ss	7/23/12	12	23
CHdv1-05ss	7/23/12	11	23
CHdv1-06ss	7/23/12	9.4	20
CHdv1-07ss	7/23/12	20	31
CHdv1-08ss-6	7/23/12	11 J	22
CHdv1-09ss	7/23/12	11	21
CHdv1-10ss	7/23/12	11	21
MTCA Method A Cleanup Level Unrestricted Use		20	250

U = Indicates the compound was undetected at the reported concentration.
J = Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.
Bold = Detected compound.
mg/kg = milligrams per kilogram

TABLE 2
INITIAL SOIL CONFIRMATION SAMPLE RESULTS
CAMPUS HIGHLANDS NORTH, DIVISION 1
LACEY, WASHINGTON

Sample ID	Sample Date	Arsenic (mg/kg)	Lead (mg/kg)
CHdv1-01gs-6	7/23/12	4.2	7.9
CHdv1-02gs-6	7/23/12	5.1	14
CHdv1-03gs-6	7/23/12	0.65 J	4.1
CHdv1-04gs-6	7/23/12	4.8	10
CHdv1-05gs-6	7/23/12	4.4	12
CHdv1-06gs-6	7/23/12	15 J	29
CHdv1-07gs-6	7/23/12	3.0 J	8.5
CHdv1-08gs-6	7/23/12	4.0	9.0
CHdv1-09gs-6	7/23/12	7.6	11
CHdv1-10gs-6	7/23/12	0.51 J	2.1
CHdv1-11gs-6	7/23/12	0.81 J	4.2
MTCA Method A Cleanup Level Unrestricted Use		20	250

U = Indicates the compound was undetected at the reported concentration.
J = Result is less than the RL but greater than or equal to the MDL and the concentration is an approximate value.
BOLD = Detected compound.
mg/kg = milligrams per kilogram

TABLE 3
FINAL SOIL CONFIRMATION SAMPLE RESULTS
CAMPUS HIGHLANDS NORTH, DIVISION 1
LACEY, WASHINGTON

Sample ID	Sample Date	Arsenic (mg/kg)	Lead (mg/kg)
CHdvl-01cn-6	10/26/12	2.9 U	2.6
CHdvl-02cn-6	10/26/12	13	17
CHdvl-03cn-6	10/26/12	2.8 U	2
CHdvl-04cn-6	10/26/12	3.3 U	5
CHdvl-05cn-6	10/26/12	2.8 U	1.8
CHdvl-06cn-6	10/26/12	3.2 U	3.7
CHdvl-07cn-6	10/26/12	9.9	25
CHdvl-08cn-6	10/26/12	13.0	56.0
CHdvl-09cn-6	10/26/12	14	15
CHdvl-10cn-6	10/26/12	2.7 U	2.6
CHdvl-11cn-6	10/26/12	2.9 U	3.6
MTCA Method A Cleanup Level Unrestricted Use:		20	250

Samples Collected from the Welland Area in Tract F

Sample ID	Sample Date	Arsenic (mg/kg)	Lead (mg/kg)
CHdvl-TrailD-6	10/26/12	12	9.7
CHdvl1d-1-6	9/30/13	8	14
CHdvl1d-2-6	9/30/13	12	17
CHdvl1d-3-6	9/30/13	21	9
CHdvl1d-4-6	9/30/13	10	14
CHdvl1d-duff-comp	9/30/13	12 U	21
MTCA Method A Cleanup Level Unrestricted Use:		20	250

Confirmation Sample Statistics		
Number of Samples	17	17
Mean Concentration	8.6	26.1
Geometric Mean	6.8	8.2
StdP	5.5	57.4
95 th Upper Confidence Limit	11.2	53.3

U = Indicates the compound was not detected at the reported concentration.
 Bold = Detected compound.
 Boxed values exceed the MTCA Method A Cleanup Level for Unrestricted Land Use
 mg/kg = milligrams per kilogram